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March 31, 2011

**VIA ELECTRONIC FILING**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

**Re: Reexamination of Roaming Obligations of CMRS Providers  
WT Docket No. 05-265**

Dear Ms. Dortch:

On March 31, 2011, Robert Quinn, Jr., and the undersigned, representing AT&T, met with Margaret McCarthy, of the Office of Michael Copps, to discuss data roaming. AT&T expressed its continued opposition to a data roaming mandate. AT&T pointed out that the record in this proceeding, as well as the attached maps, demonstrate that wireless providers already have scores of data roaming agreements with more currently under negotiation and that they are aggressively investing in and deploying next-generation wireless networks. Finally, AT&T suggested that should the Commission nevertheless endorse a data roaming mandate it must strike a careful balance in order to ensure that all parties – the roaming carrier and the roamed-on carrier – have continued incentives for infrastructure deployment and capital investment.

In accordance with Commission rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

/s/ Jeanine Poltronieri

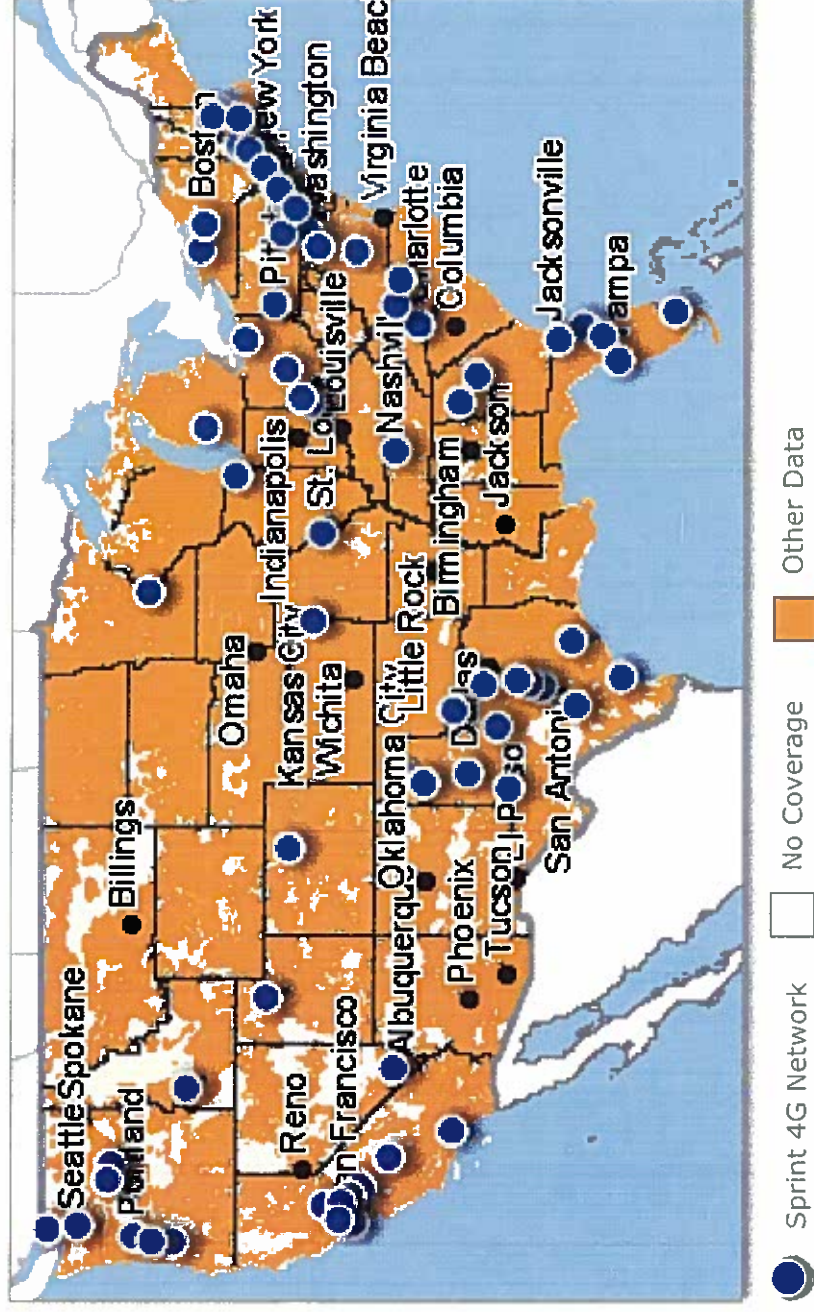
Jeanine Poltronieri

Copy: Margaret McCarthy

# Strong Competition from: Sprint/Clearwire



- Sprint 4G is now available in 71 markets, reaching more than 110 million people
- Sprint added a total of approximately 1.1 million net wireless customers in Q4 2010
- Clearwire holds approximately 140 MHz of spectrum



- Sprint rolling out 4G technology through WiMAX. Claims to allow customers to access cable broadband-like speeds wirelessly

Source: Company Website



# Strong Competition from: Leap Wireless



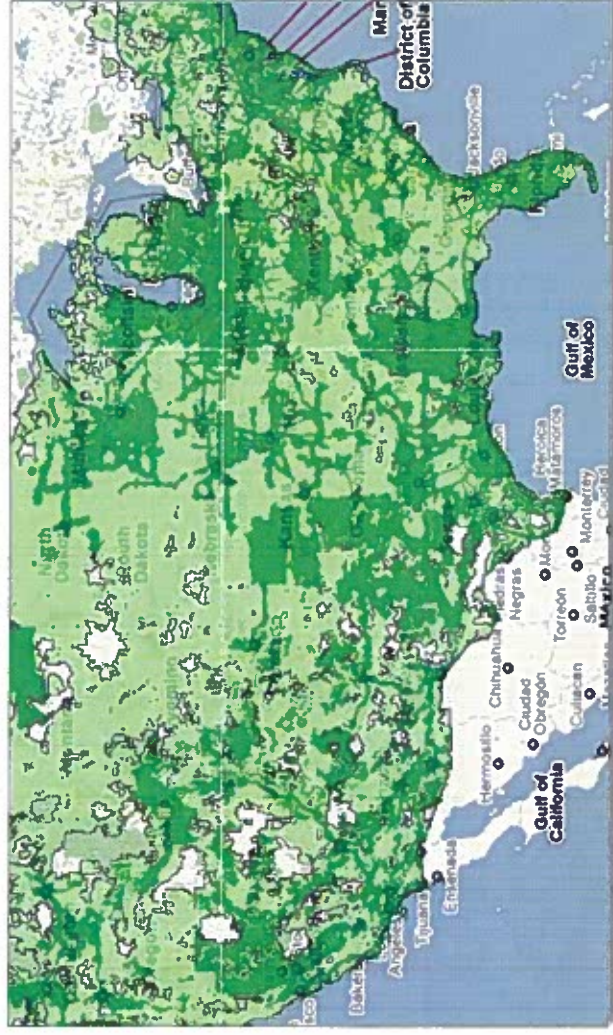
"We again have demonstrated our ability to compete, especially in periods when household cash flows improve as our seasonal results demonstrate."

"We have now got the devices, the service plans, and the nationwide 3G coverage our customers want and the combination is keeping customers with us longer. The result is a significant increase in customer lifetime value which validates that we're making the right investments in the right places."

– Doug Hutcheson, President and CEO, 22 February 2011



- Has nationwide service and provides service in 12 of the top 25 markets
- Offers popular, low priced unlimited plans
- Offers advanced services and devices (smartphones)
- In Q4 2010, Leap gained 107,000 net subs



 Nationwide Talk & Text
  Roaming
  Triband Needed





# Strong Competition from: MetroPCS



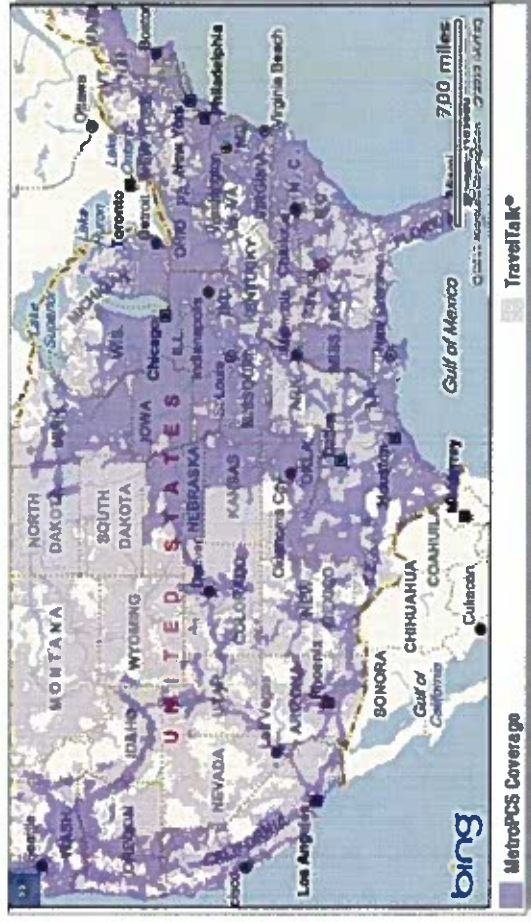
"All of our service plans include a nationwide footprint....that really puts us on par from a footprint standpoint on a combined network that is actually a tad bit larger than the Sprint network."

"By having a nationwide footprint of over 280 million POPs, we believe that it grows the pie that we can potentially sell to."

– **Braxton Carter, CFO, 3 March 2011**

"We have seen in the increasing percentage of our gross adds coming from the lower part of the postpaid contract world...roughly a third of our customers are coming from that."

– **Braxton Carter, 7 March 2011, Raymond James Institutional Investor Conference**



Nationwide Talk & Text

- MetroPCS has nationwide service, covering 280 million POPs with 8.155 million subscribers
- Offers popular, low priced unlimited plans
- MetroPCS has significant share in major cities
- In some markets, estimates show that MetroPCS has greater share than traditional carriers
- Has extensive retail distribution – MetroPCS is moving up distribution chain to reach more affluent markets
- Offers advanced services (LTE) and smartphone devices



# Strong Competition from: US Cellular



U.S. Cellular has the highest call quality and network satisfaction of any national carrier.

- Serves about 6.1 million customers in 126 markets in 26 U.S. states
- Offers Nationwide 3G Data Service
- First wireless carrier to offer plans featuring free phone replacement, one-and-done contracts, points-based rewards for customer loyalty, and monthly minute overage protection



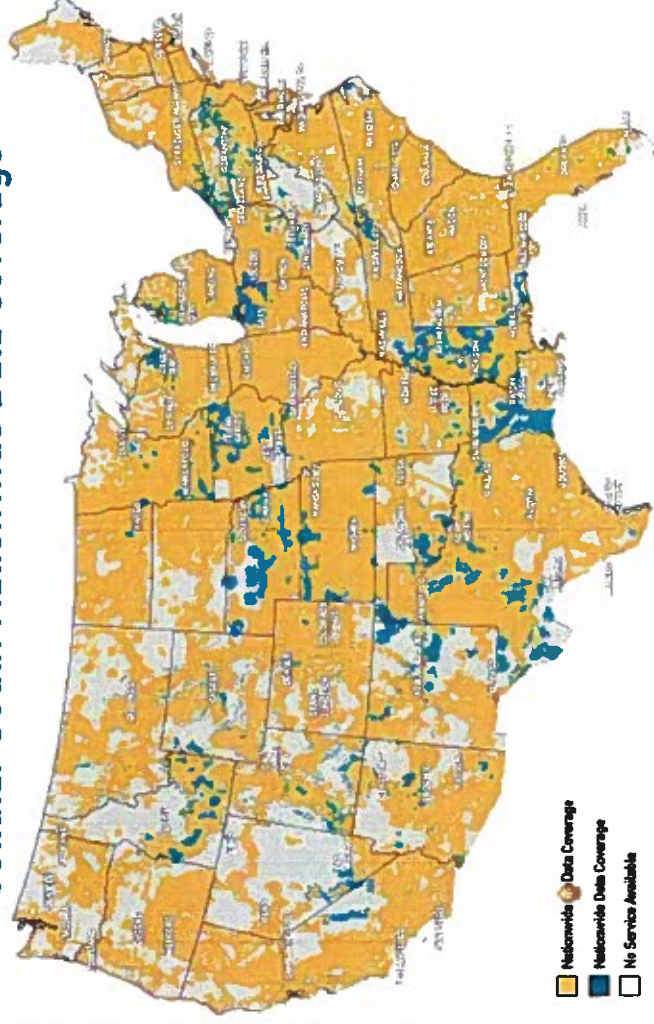


# Strong Competition from: Cellular South



Why Cellular South? We have the best coverage.  
Discover the Difference

## Cellular South Nationwide Data Coverage



- 85 retail locations, and 800,000 subscribers EOY 2008
- Purchased 700 MHz spectrum licenses in 2008 to cover Mississippi, Tennessee and Alabama
- Invested more than \$530 million in network infrastructure since 2006
- Activated over 500 new cell sites, including nearly 450 completely new sites with 3G high-speed data capacity
- Plans to launch LTE service by end of 2011 using voice-over LTE (VoLTE) and continue to expand availability across its 700 MHz footprint in 2012

Source: Company Website

